

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CALEB CRAIG JACKSON,

Plaintiff,

v.

CITY OF SEATTLE; SEATTLE POLICE
DEPARTMENT; OFFICER S. MARTINELL;
OFFICER HUGHEY; OFFICER S. SMITH;
OFFICER S. KAFFER; OFFICER D.
CONINE; OFFICER M. WOODRUFF; and
JOHN DOES 1-10,

Defendants.

NO. C08-1085RAJ

DECLARATION OF OFFICER
MICHAEL LANCASTER

I, Michael Lancaster, hereby declare as follows:

1. I am over the age of 18 years, make this Declaration based on personal knowledge, and am competent to testify to the facts contained herein.

2. I am a police officer employed by the Seattle Police Department.

3. On June 27, 2006 I was the acting sergeant for the South Precinct. I was called to screen the arrests of three suspects who had been stopped by officers whom believed that they were witnessing a drive-by shooting when one of the three suspects pointed what appeared to be

DECLARATION OF OFFICER MICHAEL LANCASTER - 1

C08-1085RAJ
3019-029672 287996

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1 a gun out of the window of a vehicle at a pedestrian. I spoke to the involved officers and
2 reviewed their reports and statements regarding the incident.

3 4. Once the driver of the vehicle, identified as Caleb Jackson, was brought to the
4 South Precinct, I conducted an interview in regards to injuries alleged to have been sustained
5 during his arrest. When I interviewed Jackson he had a small abrasion on his chin and an
6 abrasion and moderate swelling on his right cheekbone. Jackson did not complain about any
7 other injury.

8 5. I asked Jackson to tell me what had happened. Jackson told me had had paintball
9 guns and a BB gun in his car because he wanted to show them to his friends. He said he did not
10 know what had happened inside the car because he was driving. I asked Jackson what had
11 happened when he was arrested. Jackson replied, "He threw my face into the ground and told
12 me to stop resisting arrest." I asked Jackson if he resisted arrest and he answered, "I was not
13 resisting. I didn't resist anything." Then Jackson stated, "I have a real bad memory." I asked
14 Jackson to describe how the officers took him in to custody. Jackson stated that when the officer
15 put his knee on his back, Jackson's chin scraped the pavement causing the abrasion. Jackson
16 then stated that he had turned his face to the side, but kept it on the ground. Jackson stated that
17 "the officer's hand or knee" caused his face to slide on the pavement. When I told Jackson that it
18 did not sound like the officers "threw his face into the ground" as he had previously described to
19 me he stated, "No, they didn't do that." Jackson told me he followed directions and "didn't tense
20 of flex." Jackson added that he thought Officer Martinell was on his left side. Jackson stated
21 that he was not sure, stating, "I'm bad with directions, but someone pushed my head on the
22 ground." Jackson declined to make any additional statements about the events surrounding his
23 arrest.

DECLARATION OF OFFICER MICHAEL LANCASTER - 2

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4 I declare under penalty of perjury under the laws of the State of Washington and of the
5 United States that the foregoing is true and correct.

6 EXECUTED at SEATTLE, Washington this 29TH day of JANUARY 2009.

M. Lancaster

Certificate of Service

I certify that on the date noted below I electronically filed this document entitled DECLARATION OF OFFICER MICHAEL LANCASTER with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following persons:

Mark Leemon
Leemon Royer PLLC
2505 Second Avenue, Suite 610
Seattle, WA 98121
(206) 269-1100
FAX: (206) 269-7424
Attorneys for Plaintiff Caleb Craig Jackson

DATED this 29th day of April, 2009, at Seattle, Washington.

/s/ Karen L. Cobb via ECF

DECLARATION OF OFFICER MICHAEL LANCASTER - 4

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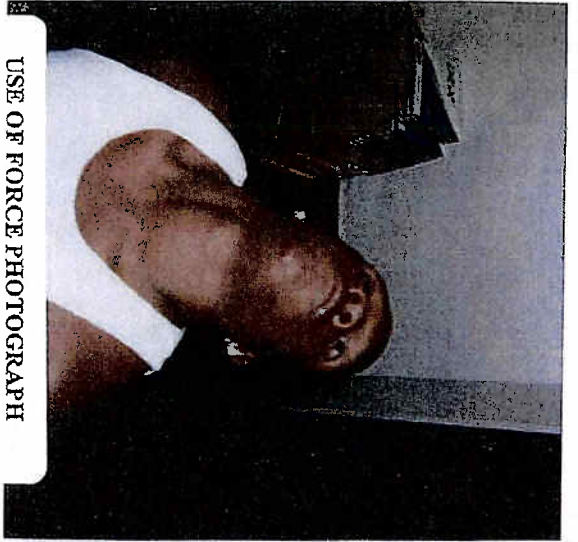
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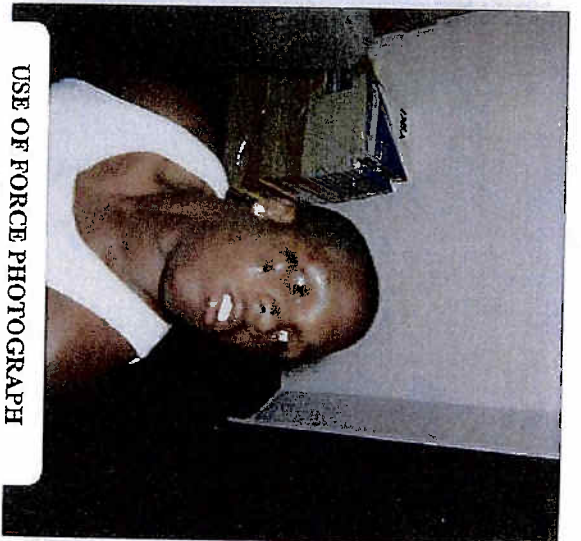
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Lancaster Declaration

EXHIBIT A



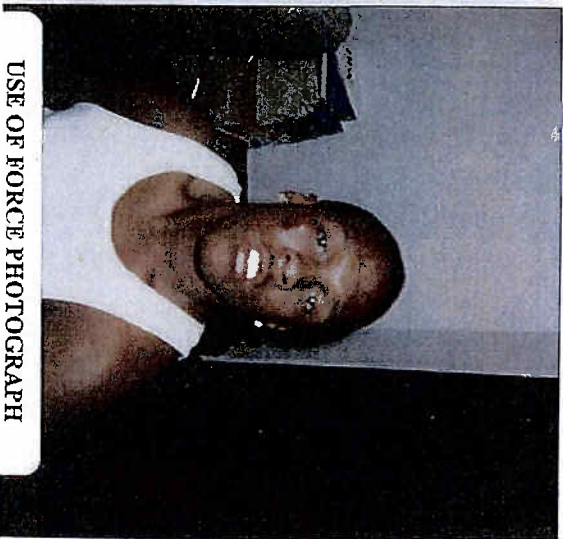
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 CASE#: 06-261186 DATE: 6/27/06
 SUPERVISOR: LANCASTER SER#: 6378
 DEPICTS SUSPECT X OFFICER



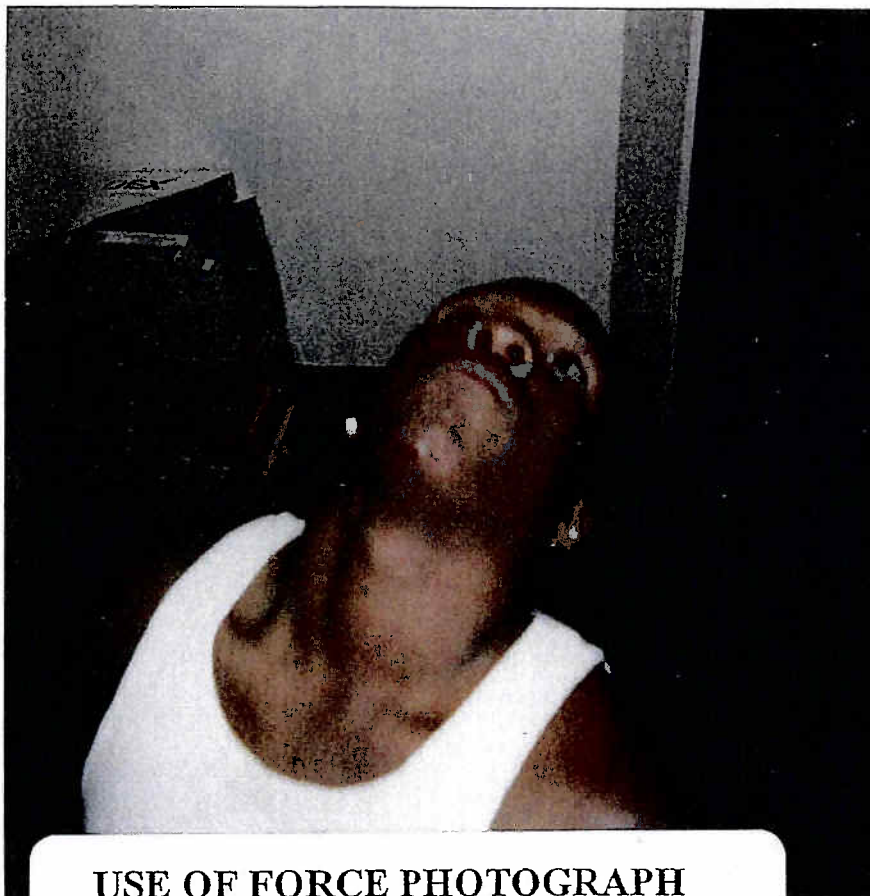
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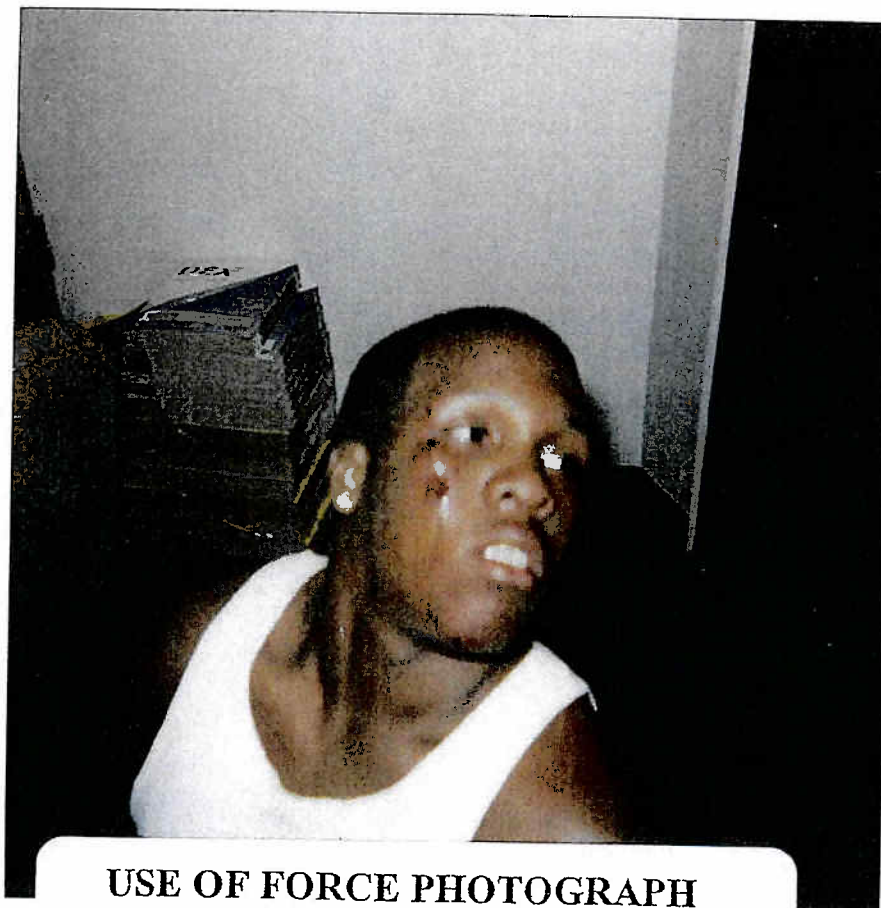


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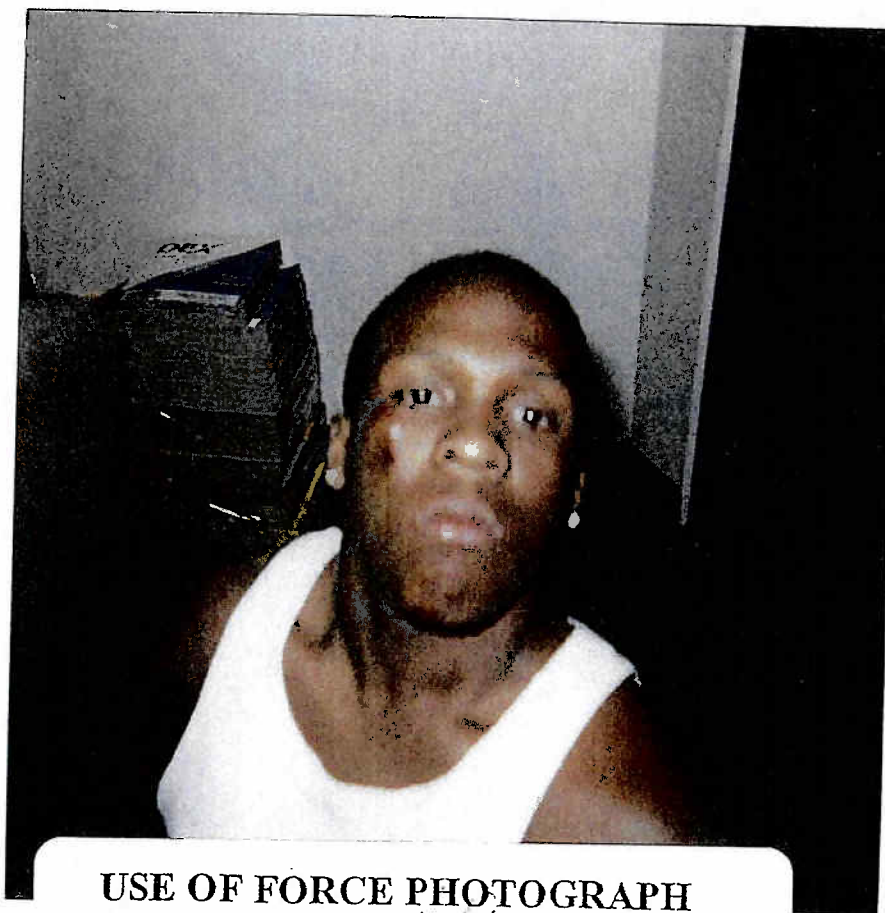
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SUSPECT: JACKSON, CALEB C.
CASE#: 06-261186 DATE: 6/27/06
SUPERVISOR: LANCASTER SER#: 6278
DEPICTS: SUSPECT X OFFICER



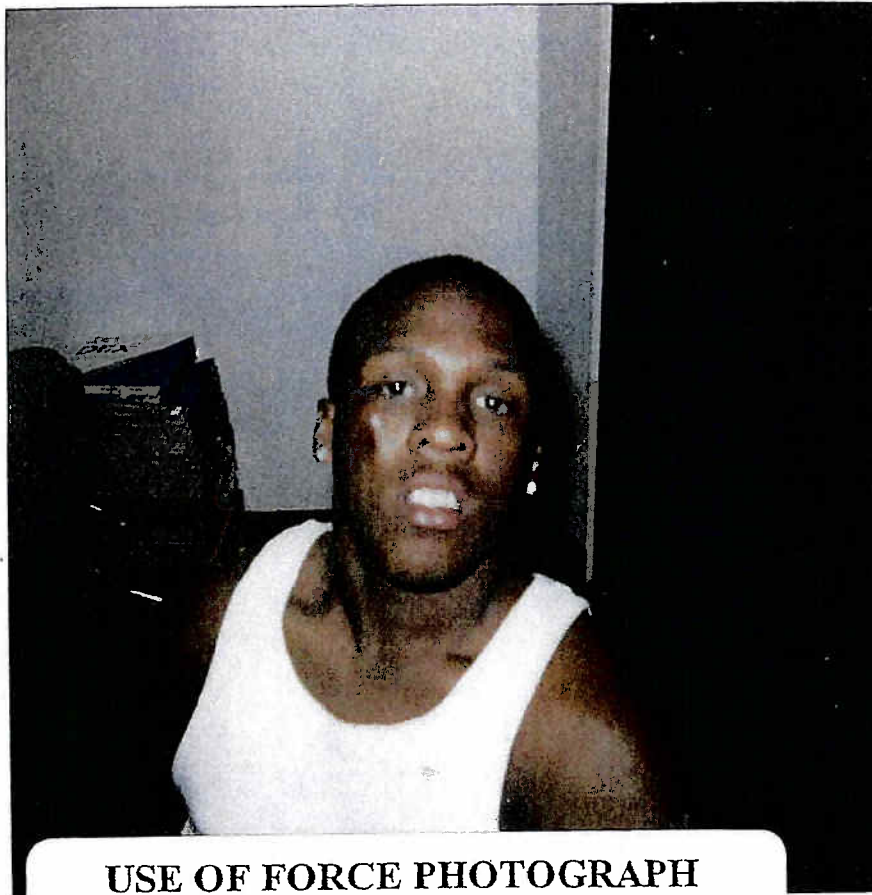
USE OF FORCE PHOTOGRAPH

SUSPECT: JACKSON, CALEB C.
CASE#: 06-261186 DATE: 6/27/06
SUPERVISOR: LANCASTER SER#: 6270
DEPICTS: SUSPECT X OFFICER



USE OF FORCE PHOTOGRAPH

SUSPECT: JACKSON, CARLOS C.
CASE#: 06-261186 DATE: 6/27/06
SUPERVISOR: LANIER SER#: 0270
DEPICTS: SUSPECT X OFFICER



USE OF FORCE PHOTOGRAPH

SUSPECT: JACKSON, CALEB C.
CASE#: 06-201186 DATE: 6/27/06
SUPERVISOR: LANCASTER SER#: 6376
DEPICTS: SUSPECT 1 OFFICER